



FULHAM REACH BOAT CLUB

EST. 2014

FRBC Data Protection Policy

Data Protection Policy: this is an inward facing document which sets out The Club's requirements for persons accessing and using personal data on its behalf (staff or third parties) to ensure that it discharges its responsibilities in connection with the administrative principles. The Data Protection Policy will usually cross refer to other internal policies (e.g. IT security, Employee Handbook etc).

This document is for anybody accessing, processing or using data on behalf of FRBC whether that be staff, volunteers or 3rd parties.

An individual's rights

For clarity, the rights under GDPR for any data subject linked to FRBC are:

- 1) The right to access –this means that individuals have the right to request access to their personal data and to ask how their data is used by the company after it has been gathered. The company must provide a copy of the personal data, free of charge and in electronic format if requested.
- 2) The right to be forgotten – if consumers are no longer customers, or if they withdraw their consent from a company to use their personal data, then they have the right to have their data deleted.
- 3) The right to data portability – Individuals have a right to transfer their data from one service provider to another. And it must happen in a commonly used and machine-readable format.
- 4) The right to be informed – this covers any gathering of data by companies, and individuals must be informed before data is gathered. Consumers have to opt in for their data to be gathered, and consent must be freely given rather than implied.
- 5) The right to have information corrected – this ensures that individuals can have their data updated if it is out of date or incomplete or incorrect.
- 6) The right to restrict processing – Individuals can request that their data is not used for processing. Their record can remain in place, but not be used.
- 7) The right to object – this includes the right of individuals to stop the processing of their data for direct marketing. There are no exemptions to this rule, and any processing must stop as soon as the request is received. In addition, this right must be made clear to individuals at the very start of any communication.
- 8) The right to be notified – If there has been a data breach which compromises an individual's personal data, the individual has a right to be informed within 72 hours of first having become aware of the breach.
- 9) The right to withdraw consent at any time - If you have provided personal information on this website and no longer consent to its use or disclosure as outlined herein, please contact us.



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Data Minimisation & Accuracy

We must ensure always to only be collecting the data that is necessary to perform the operations required for that data subject. For example, it is inappropriate to ask for a home address or financial information from someone who has simply opted-in to receiving the Newsletter.

We must also always ensure that the data held on each data subject is as accurate as possible and should be updated immediately once a data subject notifies FRBC of a change in their information. An annual data audit will need to be complete to ensure that all of the data held is still accurate and relevant.

Subject Access Request Process

If a data subject requests to see all information held by FRBC on them then this will need to be provided within 30 days of the request and for free. The data will need to be supplied in easily readable digital format e.g. An Excel export from Insightly on all data held, copies of all emails etc.

Data Retention Policy

Any data held by FRBC on its members including contact and financial data will be securely held for the duration of that member's involvement with FRBC. Should one of the adult or junior members decide to leave FRBC their data will be held securely for a period of one calendar year from the point of their request to leave the club

All data held about donors and financial supporters for FRBC will be held for a period of two years after the point from which their involvement with FRBC has ceased i.e. completion of a funded project.

Deletion will involve removing all data pertaining to the data subject on the following platforms:

- CRM systems in use
- 3rd party payment systems and other 3rd party platforms in use at the time
- Any email chains held between FRBC and the individual

If a data subject invokes their right to be forgotten at anytime then the above actions will need to take effect within 30 days of their request and for free.

Consent Policy

We must be sure that we have consent to contact individual's in the three following areas:

- FRBC products and services
- Fundraising
- FRBC General News and Activities



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If we don't have consent from an individual on any of these areas then we are not allowed to contact them about it, even if they have opted into similar areas e.g. Consent to talk to them about Products and Services does not mean we have an automatic right to talk to them about Fundraising.

The membership form for both adults and junior will contain a checkbox offering opt-ins for each of these three areas. The responses will need to be recorded in our CRM system and the mailing lists updated each time we wish to communicate with one of the three audiences.

There is also an opt-in for the Newsletter via the website which is stored on the website CMS. This list is then exported to MailChimp into the Newsletter distribution list which contains the active list of opt-outs and will remove any duplication automatically.

Before implementing these opt-ins we will need to send an email to all of the current members asking for their opt-in preferences and this will be updated in our CRM system.

A data subject can change their consent preferences at any time and this must be actioned ASAP after an alteration request is received.